

NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP

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October 5, 2016

By Electronic Mail and First Class Mail

Ms. Sheri L. Bianchin
Remedial Project Manager
Institutional Controls Coordinator
U.S. Environmental Protection Agency Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, IL 60604

**Re: NL Industries/Taracorp Superfund Site; Granite City, Illinois
Consent Decree – Quarterly Progress Report 43 (July-September 2016)**

Dear Ms. Bianchin:

As required by the Consent Decree for the NL Industries/Taracorp Superfund Site (the “site”), two copies of this letter are submitted, on behalf of the NL Industries/Taracorp Superfund Site Group (“Group”), to provide the U.S. Environmental Protection Agency (“EPA”) with a quarterly progress report for the Supplemental Environmental Project (“SEP”), operation and maintenance, and other activities that were performed during the period from July-September 2016.

1. Actions Taken During Previous Quarter to Comply with the Consent Decree:

- **Residential Soil Sampling:** Upon receipt of access agreements from property owners, the Group authorized its contractor, Environmental Works, Inc. (“EWI”), to collect soil samples from the residential properties at 1314 Iowa in Madison, 1743 Olive in Granite City, and 1723 Edison in Granite City. EWI collected the soil samples in August 2016 and submitted the soil samples for laboratory testing. The Group provided the soil sampling results to EPA, and EWI subsequently prepared a report titled Soil Sampling and Analysis Report Addendum No. 2, which the Group’s project coordinator submitted to EPA on September 22, 2016.
- **Residential Soil Remediation:** In preparation for the completion of the remaining residential soil remediation activities, the Group submitted a revised version and/or edits to the Updated Remedial Action Work Plan for Residential Soil Remediation and 1555 State Street Property Sidewalk Replacement (“Updated Remedial Action Work Plan”) to EPA on August 16, September 13, September 14, September 16, September 22, September 23, and September 27, 2016. The Group also submitted the name of its remedial action contractor, EWI, and EWI’s Certificate of Liability Insurance to EPA on August 31, 2016. The Group received a letter from EPA on September 19, 2016 which conditionally approved the Updated Remedial Action Work Plan with comments. Subsequently, the Group sent an email to EPA to confirm that EPA approved the Group’s contractor. The Group then authorized EWI to proceed with remedial activities, and the

Group sent letters to 20 property owners to seek access from several property owners and to advise the property owners regarding the schedule for remedial activities. The Group also notified the mayors of Granite City and Madison about the remedial activities.

- **Contingency Measures:** During the July-September 2016 period, the Group and EPA continued to discuss the remaining contingency measures at the site. In response to those discussions and at EPA's request, the Group inserted information regarding the contingency measures into the Updated Remedial Action Work Plan and addressed EPA's comments. The Group also initiated efforts to prepare a Contingency Measures Work Plan.
- **SEP:** The Madison County Community Development ("MCCD") continued to seek additional applicants for participation in the SEP. During the July-September 2016 period, MCCD continued to advertise the SEP on the Granite City public access television channel but was unable to obtain any applicants for participation in the SEP. For the project to date, mitigation and clearance testing have been performed and determined by MCCD to be complete at 126 properties located within the boundaries of the site. Based upon EPA's determination that the SEP completion date will not extend beyond March 8, 2017, the Group continued to prepare a SEP Completion Report.
- **Operation and Maintenance:** During the July-September 2016 period, the following operation and maintenance activities were performed at the site:

July 6	The Group's contractor, TNT Fence Company, repaired a small hole in the perimeter security fence on the 1555 State Street property.
July 9	The Group's project coordinator spoke to the owner of All Pallet Service and confirmed that TNT Fence Company repaired the fence for All Pallet Service around the southwestern side of the Taracorp pile.
July 11	The Group's contractor, Munie Greencare Professionals ("Munie"), cut the vegetation on the main industrial site, including on Taracorp pile.
July 11	Munie sprayed herbicide to control the growth of vegetation along the concrete storm water drainage swale around the Taracorp pile at the main industrial site.
August 18	The Group's project coordinator spoke to Mr. John Birdsong, Granite City Sanitation Department, and notified Munie regarding the need to cut vegetation on the 1555 State Street property.
August 25	Munie cut the vegetation on the 1555 State Street property.
August 29	The Group's project coordinator sent an email to advise Mr. John Birdsong, Granite City Sanitation Department, that Munie completed work on August 25 to cut the vegetation on the 1555 State Street property.
September 2	The Group's project coordinator sent an email to Munie, in response to an injury from the Granite City Sanitation Department, regarding the status of mowing at the site.
September 14	The Group's project coordinator sent an email to advise the Granite City Sanitation Department that Munie remobilized to the 1555 State Street property and used a weed eater to re-cut the vegetation along the perimeter security fence.

- **Project Coordination:** During the July-September 2016 period, the Group's project coordinator communicated with the following parties regarding work at the site:

July 1	Issued SEP Quarterly Progress Report 14, prepared by MCCD, to EPA.
July 1	Submitted Quarterly Progress Report 42 to EPA.
July 11	Communicated with EPA's project manager and confirmed that EPA was continuing to seek access from the owner of the residential property at 1314 Iowa.
July 12	Spoke to EPA's project manager in regard to soil sampling activities, residential soil remediation, operation and maintenance activities, and potential contingency measures.
July 22	Sent a letter to EWI on behalf of the Group to authorize EWI to collect and analyze samples on the residential properties at 1743 Olive, 1723 Edison, and 1314 Iowa, if EPA obtained access from the owner of the 1314 Iowa property.
July 25	Sent an email to the owner of the State Street Warehouse property to respond to the owner's inquiry regarding soil sampling on the 2218 Edison Avenue property and sent a copy of the email to EPA.
July 27	Spoke to EPA's project manager in regard to soil sampling activities, residential soil remediation, operation and maintenance activities, and potential contingency measures.
July 28	Sent an email to EPA to provide a draft letter to the owner of the residential property at 1314 Iowa.
August 3	Spoke to EPA's project manager in regard to soil sampling on the 1314 Iowa Street property and the letter to the property owner.
August 4	Sent an email to EPA's project manager to provide a copy of a revised draft letter to the owner of the 1314 Iowa Street property.
August 5	Spoke to EPA's project manager in regard to contingency measures at the site.
August 5	Sent a letter on the Group's behalf to the owner of the 1314 Iowa Street property to request access for soil sampling and to advise the property owner regarding the schedule for soil sampling. A copy of the letter was also sent to EPA.
August 5	Sent letters on the Group's behalf to notify the owners of the residential properties at 1723 Edison and 1743 Olive regarding the schedule for soil sampling activities. Provided copies of the letters to EPA.
August 12	Participated in a conference call with EPA and Group representatives and discussed the Updated Remedial Action Work Plan and the scope of the contingency measures program.
August 16	Sent an email to EPA to provide the text of the Updated Remedial Action Work Plan.
August 16	Sent an email to EPA's project manager to acknowledge receipt of the signed access agreement from the owner of the residential property at 1314 Iowa Street.

August 16	Sent an email to EWI's project manager, with copies to EPA and Illinois EPA, to provide a copy of the signed access agreement for soil sampling on the 1314 Iowa Street property and to request that EPA contact the property owner regarding the soil sampling schedule.
August 18	Spoke to EPA's project manager in regard to the Updated Remedial Action Work Plan and contingency measures.
August 23	Sent an email to representatives of EPA, Illinois EPA, and EWI to advise them that the second signed access agreement for soil sampling had been received from the owner of the 1314 Iowa Street property.
August 29	Sent an email to advise EPA's project manager that the Group's consultant, EWI, successfully collected soil samples on August 24 on the residential properties at 1723 Edison, 1743 Olive, and 1314 Iowa.
August 31	Sent an email and letter to EPA to: (a) notify EPA that the Group plans to award a contract to EWI, upon receipt of EPA's approval of the Updated Remedial Action Work Plan, for residential soil remediation at the site; and (b) provide EWI's certificate of liability insurance.
August 31	Received an email from EPA's project manager indicating that the Updated Remedial Action Work Plan is approvable, except that additional details related to contingency measures need to be added.
September 1	Sent an email to EPA's project manager in regard to the Updated Remedial Action Work Plan, residential soil sampling, contingency measures, the Institutional Controls Work Plan, and the Operation and Maintenance Plan.
September 6	Participated in a conference call with EPA's project manager and Illinois EPA representatives.
September 7	Participated in a conference call with representatives of EPA and the Group.
September 13	Sent an email to respond to an inquiry and advise the Madison County trustee that remedial activities were completed on the residential property at 1731 Chestnut in 2015 and that, based upon a final inspection with Illinois EPA on June 2, 2016, no further action was determined to be necessary.
September 13	Submitted a revised version of the Updated Remedial Action Work Plan to EPA to address comments discussed during the September 7 conference call.
September 14	Sent an email to EPA to provide a copy of an updated spreadsheet that will be included in Appendix 1 of the Updated Remedial Action Work Plan.
September 14	Sent an email to EPA to provide copies of letters being mailed on September 14 to the owners of the residential properties at 1314 Iowa and 1743 Olive to: (1) provide the results from soil sampling activities performed on their properties in August 2016; and (2) advise them, based on the sampling results, that no further action is required.
September 14	Spoke to the Granite City Building and Zoning Administrator and subsequently sent an email to EPA about potential methods that could be used to monitor land use changes in Granite City.
September 15	Participated in a conference call with EPA's project manager and Illinois EPA representatives.

September 16	Sent an email to EPA to provide several edited pages to the Updated Remedial Action Work Plan that were revised based upon the results of the September 15 conference call.
September 19	Received an email from EPA which provided EPA's approval, with conditions, of the revised version of the Updated Remedial Action Work Plan, and initiated efforts to address EPA's comments.
September 22	Sent an email to EPA to provide: (1) the Group's responses to EPA's September 19 comments on the Updated Remedial Action Work Plan; and (2) an edited version of the Updated Remedial Action Work Plan which had been revised to address EPA's comments. The Group's project coordinator requested EPA's approval in order for the Group to proceed with remedial activities.
September 22	Spoke to EPA's project manager regarding the Updated Remedial Action Work Plan.
September 22	Received EPA's June 29, 2015 final approval letter, with comments, of the May 2015 Remedial Action Work Plan for Residential Soil Remediation.
September 22	Sent an email to EPA to provide the document titled Soil Sampling and Analysis Report Addendum No. 2, which was prepared on the Group's behalf by EWI to document the results from soil sampling activities performed on three residential properties (1743 Olive, 1314 Iowa, and 1723 Edison) at the site in August 2016.
September 22	Received copies of communications from the Group's counsel and EPA's attorney in regard to the schedule for payment of EPA's past costs.
September 23	Sent an email to EPA to provide an edited version of Section 1.1 (page 1-1) of the Updated Remedial Action Work Plan to provide additional clarity regarding the events in September 2015.
September 27	Sent an email to EPA to provide an update regarding the anticipated schedule for the start-up of the remaining residential soil remediation activities at the site and received a response from EPA.
September 28	Sent letters to 20 residential property owners to notify them regarding the schedule for remedial activities and, for several property owners, to seek access for remedial activities.
September 29	Sent an email to EPA to confirm that EPA's "green light to proceed" with remedial activities was intended as the "authorization to proceed" that EPA required to provide pursuant to Paragraph 9a of the Consent Decree.
September 29	Issued a contract to EWI, on behalf of the Group, to confirm the authorization previously provided to EWI to perform residential soil remediation activities.
September 29	Sent a copy of the Consent Decree to EWI, pursuant to the requirements of the Consent Decree.
September 29	Sent emails to EPA to provide copies of letters that were sent to 20 residential property owners to notify them regarding the schedule for remedial activities and, for several property owners, to seek access for remedial activities.

2. **Summary of Data and/or Results of Sampling and Tests Received:**

- As indicated above, the Group submitted EWI's Soil Sampling and Analysis Report Addendum No. 2 to EPA to provide the results from soil sampling performed on the residential properties at 1314 Iowa, 1743 Olive, and 1723 Edison.

3. **Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Quarter:**

- As indicated above, the Group submitted EWI's Soil Sampling and Analysis Report Addendum No. 2 to EPA to provide the results from soil sampling performed on the residential properties at 1314 Iowa, 1743 Olive, and 1723 Edison.
- As indicated above, the Group submitted revised versions of the Updated Remedial Action Work Plan to EPA.

4. **Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:**

- The Group will continue to perform operation and maintenance activities at the site. A semi-annual operation and maintenance inspection will be performed the site during the October-December 2016 period.
- The Group anticipates that EPA will issue its final approval of the Updated Remedial Action Work Plan.
- Upon completion of pre-mobilization activities, the Group anticipates that its contractor, EWI, will mobilize to the site on October 17, 2016 and perform residential soil remediation activities pursuant to the Updated Remedial Action Work Plan.
- The Group will continue to update the Institutional Controls Work Plan and submit the document to EPA upon completion.
- The Group will continue to prepare a Contingency Measures Work Plan and submit the document to EPA upon completion.
- The Group anticipates that EPA will provide comments on the draft Institutional Controls Work Plan. The Group will continue to update the draft Institutional Controls Work Plan and the Updated Remedial Action Work Plan.
- The Group and EWI will continue to prepare a report to document the completion of remedial activities at 14 residential properties in 2015.
- The Group anticipates that EPA will obtain an access agreement from the owner of the residential property at 1314 Iowa.

- The Group and MCCD will continue to prepare a SEP Completion Report. MCCD will continue to implement the SEP and seek additional participants in the SEP. The Group will provide copies of MCCD's progress reports to EPA on a quarterly basis.
- Upon receipt of additional information from EPA, the Group will continue efforts with EPA and City of Venice representatives to prepare a roadways ordinance.
- The Group will address comments, if any are received from EPA, in regard to the Five-Year Review Groundwater Monitoring Report, which was submitted to EPA on August 11, 2014 to summarize the results of the April 2014 groundwater monitoring event.
- The Group will address comments, if any are received from EPA, in regard to: (1) the Soil Sampling and Analysis Report, which was submitted to EPA in January 2014 to document the results from soil sampling activities at 73 residential properties in April – May 2011, September 2012, June 2013, and October 2013; (2) the Soil Sampling and Analysis Report Addendum, which was submitted to EPA in December 2015 to document the results of soil sampling performed on three residential properties (1011 McCambridge, 1121 Reynolds, and 2222 Edison) in June 2015 and one residential property (2112 Missouri Avenue) in November 2015; and (3) the Soil Sampling and Analysis Report Addendum No. 2, which was submitted to EPA in September 2016 to document the results of soil sampling activities performed on three residential properties (1314 Iowa, 1743 Olive, and 1723 Edison) in August 2016.
- Upon receipt of EPA's comments, the Group will continue to prepare and finalize the draft environmental covenant and the draft Communication Plan for Venice Alleys.
- Upon receipt of EPA's approval of the scope of the one-call notification program, the Group will prepare a services agreement, identify and retain a contractor, and begin to implement the one-call notification program.
- The Group will respond to EPA's comments, if any are received, on Addendum 1 to the SEP Work Plan, which was issued to EPA on November 11, 2011, to request EPA's approval of the procedure to be used by MCCD for soil sampling within the drip zones of homes being addressed as part of the SEP.
- The Group will continue to work with EPA to develop a program for institutional controls at the site and will continue to update EPA with periodic status reports and during conference calls.

5. Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:

- As previously reported, the level of public participation in the SEP has been less than originally anticipated by the MCCD. The MCCD will continue efforts to attempt to obtain additional participation. The Group will continue to advise EPA regarding MCCD's efforts and schedule.

6. **Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:**

- Not applicable for this reporting period.

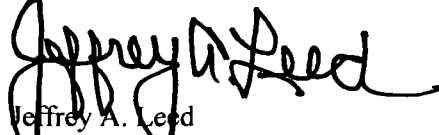
7. **Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:**

- As indicated above, the MCCD is continuing to attempt to encourage other homeowners to participate in the SEP.

Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

LEED ENVIRONMENTAL, INC.


Jeffrey A. Leed
Project Coordinator

cc: Nicole Wood-Chi, Esq. – U.S. Environmental Protection Agency (by electronic mail)
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Technical Committee, NL Industries/Taracorp Superfund Site Group (by electronic mail)